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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

YESENIA LARA, aka YESENIA
NOLASCO VARGAS,

Plaintiff,

v.

UNITED STATES OF AMERICA;
ALEJANDRO MAYORKAS, in his
Official Capacity, Secretary, Department of
Homeland Security; MERRICK
GARLAND, in is Official Capacity,
Attorney General, Department of Justice;
TAE D. JOHNSON, in his Official
Capacity, Acting Director of U.S.
Immigration and Customs Enforcement;
UR MENDOZA JADDOU, in her Official
Capacity, Director of U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 2:21-cv-01845

**Stipulation and Order for Extension
of Time**

(First Request)

Plaintiff YESENIA LARA, and Defendant UNITED STATES OF AMERICA;
ALEJANDRO MAYORKAS, in his Official Capacity, Secretary, Department of
Homeland Security; MERRICK GARLAND, in is Official Capacity, Attorney General,
Department of Justice; TAE D. JOHNSON, in his Official Capacity, Acting Director of
U.S. Immigration and Customs Enforcement; and UR MENDOZA JADDOU, in her
Official Capacity, Director of U.S. Citizenship and Immigration Services, hereby stipulate

and agree that Defendants may have a 21-day extension of time, from December 7, 2021 to December 28, 2021, to respond to Plaintiff's Complaint For Declaratory and Injunctive Relief (ECF No. 1).

The parties are attempting to settle the case and they remain hopeful that a settlement will be forthcoming. Moreover, defense counsel's calendar is busier than normal with upcoming hearings and multiple filing deadlines in several cases, including two before the Ninth Circuit. Under the circumstances, good cause exists to extend the deadline for Defendants to respond to Plaintiff's Complaint For Declaratory and Injunctive Relief. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

This is Defendants' first request for an extension of time. *See* LR IA 6-1(a) (must advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this extension request, and he has advised that he does not oppose the request. This stipulation is made in good faith and not for the purpose of undue delay.

DATED: December 7, 2021

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Xavier Gonzales
XAVIER GONZALES
Attorney for Plaintiff

/s/ Holly A. Vance
HOLLY A. VANCE
Assistant U.S. Attorney
Attorney for Defendant

IT IS SO ORDERED.

Dated: December 8, 2021


UNITED STATES MAGISTRATE JUDGE